

ATTACHMENT A

Short-Form Application Filing Instructions

This attachment provides instructions on submitting a short-form application to participate in Auction 901. It also includes instructions for interested parties wishing to view the short-form applications that have been filed.

I. Application Preparation and Submission

Among other requirements, in order to participate in this auction, each applicant must submit its short-form application (FCC Form 180) electronically, via the FCC Auction System. All **short-form applications for Auction 901 must be submitted and confirmed prior to 6:00 p.m. EST on Wednesday, July 11, 2012.** Late applications or unconfirmed submissions of electronic data will not be accepted.

We remind applicants that all the required information for applicants to participate in the Mobility Fund Phase I auction is necessary to determine each applicant's qualifications, and as such will be available for public inspection. Accordingly, unnecessary sensitive information, such as Taxpayer Identification Numbers or Social Security Numbers, should not be included in the short-form application. Applicants may request that submitted information not be made routinely available for public inspection following the procedures set forth in section 0.459 of the Commission's rules.¹ Such requests must be included as attachments to the applicant's FCC Form 180 and identify the specific information to which the request applies. Because the required information bears on each applicant's qualifications, confidentiality requests will not be routinely granted.²

Applicants may make multiple changes to their short-form applications until the close of the filing window. However, they must press the **SUBMIT** button in the FCC Auction System for the changes to be submitted and considered by the Commission.

A. Minimum Software Requirements

The following software, at a minimum, is required to use the FCC Auction System:

- Web Browser, either of the following is recommended:
 - Microsoft® Internet Explorer 7.0 or higher, with Microsoft VM or Java Plug-In
 - Mozilla® Firefox® 3.5 or higher, with Java Plug-In

To obtain the Java Plug-In, navigate your web browser to <http://www.oracle.com/technetwork/java/javase/downloads/index.html>, and click the Download button in the JRE column under *Java Platform, Standard Edition*.

- PDF Viewer: Adobe Acrobat Reader 5.0 or higher (available at <http://www.adobe.com>)
- Minimum Screen Resolution: 1024 x 768

¹ 47 C.F.R. § 0.459.

² 47 C.F.R. § 0.459(a).

Currently, the Apple® Mac OS® is not supported.

B. Logging On

To submit, edit, or withdraw a short-form application (FCC Form 180) online, an applicant should open its web browser and navigate to either <http://auctions.fcc.gov/> (primary location) or <http://auctions2.fcc.gov/> (secondary location). Once on the *FCC Auction System* page, the applicant may log in using its FCC Registration Number (“FRN”)³ and password. On the *My Auctions* page select the **Click here to file FCC Form 180** link under the Connect America Fund Section. This produces the *Auction Manager* page which allows an applicant to create a new application or review or modify an existing application.

C. Application Filing Instructions

The short-form application (FCC Form 180) requests information needed to determine whether an applicant qualifies to participate for the Mobility Fund Phase I support.⁴ Applicants must submit required information as entries in the data fields of the FCC Form 180 whenever a data field is available for that information. Attachments should not be used to provide information that can be supplied within the data fields of the FCC Form 180.

The screens comprising FCC Form 180 consist of five series, each requesting five separate types of information: 1) *Applicant Information*; 2) *Applicant’s Potentially Eligible Areas*; 3) *Agreements*; 4) *Ownership*; and 5) *Certify and Submit*. In addition, *Summary* screens, a sixth series, appear prior to the *Certify and Submit* screens. The *Summary* screens provide an overview of an applicant’s FCC Form 180 that facilitates reviewing and revising specific information, as well as an automated check for certain inconsistencies and omissions in submitted information.

To simplify filling out FCC Form 180, certain initial information an applicant provides is used to determine what additional information is needed, and what subsequent screens will appear to collect that information. For example, a corporate applicant, unlike a general partnership applicant, must identify a corporate officer or director responsible for the application (sometimes called a responsible party). If an applicant identifies itself as a general partnership, no additional information is needed regarding an additional responsible party, and screens requesting responsible party information will not appear. However, if the applicant identifies itself as a corporation, subsequent screens in the FCC Form 180 will ask for responsible party information.

Applicants must fill out FCC Form 180 by following the instructions below. Additional help in filling out FCC Form 180 can be accessed in two ways: 1) by clicking on the **Help** link in the upper right of any screen, which will open Auction Application Online Filing Help; or 2) by clicking on the text of any **Common Question** link appearing on the right side of the screen. The common questions displayed relate to the current screen and vary from screen to screen. In the event the assistance provided by these sources is insufficient, applicants should use the contact

³ An FRN is a 10-digit number that is assigned to a business or individual that has registered with the FCC. It is used to uniquely identify an individual or business in all transactions with the FCC. If you do not have an FRN, you must register through the FCC’s Commission Registration System (CORES) before filing your application. A CORES link is provided on the Log On page.

⁴ See generally, 47 C.F.R. §§ 1.21001, 54.1005. See also “Mobility Fund Phase I Auction Scheduled for September 27, 2012; Notice and Filing Requirements and Other Procedures For Auction 901,” *Public Notice*, AU Docket No. 12-25, DA 12-641 (rel. May 2, 2012) (“*Auction 901 Procedures Public Notice*”).

information provided in the *Auction 901 Procedures Public Notice* to obtain additional assistance.⁵

1. Applicant Information

The *Applicant Information* screens are the first series of screens in FCC Form 180, in which the applicant will provide basic information including:

- Applicant’s legal classification (e.g., corporation, general partnership, limited liability company, etc.)
- Applicant’s name, which will be used as the bidder name during the auction⁶
- Applicant’s jurisdiction of formation for legal entities
- Applicants that are classified as legal entities (e.g., corporations) must provide the name of and information regarding the entity’s responsible individual⁷
- Name, street address, telephone and fax number of a contact person who will communicate with the Commission regarding the applicant’s FCC Form 180⁸
- Names of up to three persons authorized to bid for the applicant in the auction⁹

Each screen will specify the information that the applicant must provide. Please note the following with respect to particular information requested:

- An applicant must indicate its legal classification before continuing to subsequent screens, because the legal classification will determine which subsequent screens will appear.
- P.O. Boxes may **not** be used for an applicant’s address.
- To simplify filling out the FCC Form 180, an applicant that has the same address as its contact person can click on the **COPY APPLICANT ADDRESS** button to automatically fill in the contact person’s address. P.O. Boxes may **not** be used for a contact person’s address.
- Applicants must identify at least one authorized bidder. While applicants may change their authorized bidders at a later date, only those bidders listed on the FCC Form 180 will be authorized to place bids for the applicant during the auction.

⁵ See *Auction 901 Procedures Public Notice* at para. 193 (Section VI. “Contact Information”).

⁶ See 47 C.F.R. § 1.21001(b)(1).

⁷ See 47 C.F.R. § 1.21001(b)(1).

⁸ FCC personnel will communicate only with an applicant’s contact person or certifying official, as designated on the applicant’s FCC Form 180, unless the applicant’s certifying official or contact person notifies the Commission in writing that applicant’s counsel or other representative is authorized to speak on its behalf. Authorizations may be sent by e-mail to auction901@fcc.gov.

⁹ See 47 C.F.R. § 1.21001(b)(2).

- Any qualified bidder may bid online through its authorized bidder(s) during the auction.

2. Applicant's Potentially Eligible Areas

The Applicant's *Potentially Eligible Areas* screens make up the second series of screens in FCC Form 180. This series of screens uses information provided by the applicant to limit for that applicant the set of areas eligible for Mobility Fund Phase I support to those in which the applicant is potentially eligible to bid.¹⁰ The identification of an area as one in which the applicant is *potentially* eligible to bid does not mean that the applicant is *actually* eligible to bid for support in that area. As a first step in identifying the set of potentially eligible areas with respect to an application, the applicant provides the Eligible Telecommunications Carrier (ETC) Study Area Code(s) (SAC(s)) and any Tribal lands identified by a Tribally-owned or -controlled applicant as the subject of a pending petition by it for ETC designation. Then, to identify an applicant's potentially eligible areas, the Auction System will only be able to identify all areas eligible for Mobility Fund Phase I support that are within the same state as the study area(s) associated with SAC(s) provided by an applicant, as well as all areas eligible for Mobility Fund Phase I support that are within Tribal lands identified by an applicant as the subject of a pending petition for ETC designation. Some of those areas may be outside the areas for which an applicant is actually eligible to bid pursuant to the Commission's rules – *i.e.* the areas in which it is designated as an ETC or, in the case of a Tribally-owned or -controlled entity, areas in its Tribal lands for which it has a pending petition for designation as an ETC. Thus, the listing of any area in these screens as a potentially eligible area is not a determination of eligibility under the Commission's rules.

In these screens, the applicant will identify the Study Area Code(s) (SAC(s)) associated with its ETC designation(s). In the alternative or in addition, a Tribally-owned or -controlled applicant will provide the name(s) of the Tribal land(s) corresponding to any pending petition by it for ETC designation for those Tribal land(s) covering the area in which the applicant may wish to bid during the auction. Finally, the applicant will specify in this series of screens whether it is a Tribally-owned or -controlled entity eligible to claim a bidding credit available for Tribal entities with respect to their Tribal land(s).

To submit the FCC Form 180 to participate in the Mobility Fund Phase I auction, applicants must identify at least one SAC or Tribal land name. Until a SAC or Tribal land name is identified, the applicant cannot submit the FCC Form 180. An applicant cannot add additional, or change previously identified, SAC(s) and/or Tribal land(s) after the initial filing window has closed. Therefore, during the initial filing window, it is important to carefully review the information provided to make sure all SAC(s) and Tribal land(s) names that cover areas on which the applicant is eligible and may wish to bid have been selected.

The FCC Auction System will not allow applicants to change the list of SACs and Tribal lands or to claim a bidding credit for Tribal entities after the short-form application filing deadline. Note that the list of SACs and Tribal lands determines the areas for which an applicant will be able to place bids.

On the first screen in this series, the *Potentially Eligible Areas* Study Area Code (SAC) screen, an applicant must state whether it has a SAC and, if so, must enter the SAC(s) associated with its

¹⁰ Please note that this differs from the past identification of areas as potentially eligible for Mobility Fund Phase I support.

designation as an ETC. If not, an applicant will select “No”, and will be directed to the next screen. Multiple SACs can be entered in this area but must be separated with commas. To remove or modify a SAC(s), highlight the specific SAC(s) in the “Add SAC” text box and delete or correct as needed.

Continuing to the second screen in this series, the *Potentially Eligible Areas* Tribal Land Information screen, an applicant must state if it is a Tribally-owned or -controlled entity with a pending application to become an ETC in its Tribal lands covering the area for which it is seeking support, and if so, must select the Tribal land(s) associated with the pending designation in which the applicant will want to be able to place bids during the auction.

- To select the Tribal Land(s), select the state covering the applicant’s pending ETC application from the “State covering Tribal Land(s)” dropdown. The system will display a list of Tribal land(s) located within that state. An applicant can select the applicable Tribal land(s) by: (1) clicking on an individual name; (2) clicking on the “Select All” button, if all are applicable; or (3) to make multiple selections the applicant can press the CTRL key while simultaneously clicking each applicable “Tribal land.” Once an applicant has selected all of the Tribal lands it is interested in, it should click the “**ADD**” button.
- An applicant having multiple pending ETC applications must repeat the above process for each applicable state.
- Tribal land(s) can be removed from the “Selected Tribal Land(s)” box in the same manner described above by using the “**REMOVE**” button.

NOTE: A Tribally-owned or -controlled entity could have both a SAC(s) and pending ETC application(s). On this screen only those applicants with a pending ETC application(s) select a Tribal land(s) covered by their pending application(s). Subsequent screens will list Tribal lands in the state related to any SAC(s) entered on the previous screen and any specific Tribal lands selected on this screen.

The third screen in this series is the *Potentially Eligible Areas* Tribal Land Bidding Credit designation screen. In Auction 901 for Mobility Fund Phase I, the Commission makes available a bidding credit for a Tribally-owned or -controlled entity seeking support to serve areas within its associated Tribal land.¹¹ For purposes of the Mobility Fund Phase I bidding credit for Tribal entities, or the Auction 901 Tribal land bidding credit, a Tribally-owned or -controlled applicant must indicate in Form 180 if it is eligible to receive and is seeking a bidding credit for serving its Tribal land(s) eligible for Mobility Fund Phase I support, and if so, specify which Tribal land(s) it wants to apply the credit towards. This screen will list Tribal lands in the state related to any SAC(s) entered on previous screens and any specific Tribal lands selected on previous screens. The 25 percent “reverse” bidding credit is available for Tribally-owned or -controlled providers and is only available with respect to the eligible census blocks located within the geographic area defined by the boundaries of the Tribal land associated with the provider seeking support. The bidding credit reduces the Tribal entity’s bid amount for purposes of comparing it to other bids.

¹¹ In Form 180 for Auction 901, this is sometimes referred to in an abbreviated form as a Tribal land bidding credit, though it differs in its purpose and requirements from a similarly named bidding credit in spectrum license auctions that is available for serving Tribal land.

- Select the Tribal land(s) where you want the credit to apply from the list by: (1) clicking on an individual name; (2) clicking on the “Select All” button, if all are applicable; or (3) to make multiple selections the applicant can press the CTRL key while simultaneously clicking each applicable “Tribal land.” Once an applicant has selected all of the Tribal lands it wants the credit applied to, it should click the “**ADD**” button.
- Tribal land(s) selections can be removed from the “Selected Tribal Land(s)” box in the same manner described above by using the “**REMOVE**” button.

Continuing takes you to the final screen in this series, the *Potentially Eligible Areas* summary screen. This screen provides a summary listing of all the SAC(s) and/or Tribal land(s) successfully saved by the applicant. Each item name is a link that you can click to produce a listing of all the census tracts/blocks for which support is offered in a state that includes the SAC and/or all the census/tracts/blocks for which support is offered in the Tribal land, which may include areas in more than one state. The list will include the state, county, qualifying road miles, and, where applicable, Tribe name and bidding credit for the areas listed. Two additional links are provided at the bottom of the page, “All Census Tracts/Blocks Pertaining to Applicant’s Selection” and “Potentially Eligible Areas Map Pertaining to Applicant’s Selection.” Both the complete list of all areas and the map will include areas for which support is offered in states that include SAC(s) entered in the application and in Tribal lands identified in the application.

If a Census Tract/Block is not shown or is incorrect, applicants should review their SAC(s) and/or Tribal land(s) to make sure all selections were made and/or entered accurately. An applicant can click the “**EDIT**” button at the bottom of the page to return to the Study Area Code (SAC) screen, as described above.

When all potentially eligible areas have been identified, click the **CONTINUE** button.

NOTE: A warning message to upload a “Spectrum Access” attachment will display if the applicant has not already done so. The system will allow an applicant to continue but will not permit the application to be submitted without the required attachment. For further details refer to Section II.E.2 of the *Auction 901 Procedures Public Notice*.

3. Agreements

The *Agreements* screens are the third series of screens in FCC Form 180. In these screens, applicants will provide information regarding auction-related agreements subject to disclosure under the Commission’s rules.¹²

On the first screen, applicants must state whether they have any agreements that are subject to disclosure under the Commission’s rules by responding “Yes” or “No” to a question asking whether the applicant has entered into any agreements relating to the participation of the applicant in the competitive bidding. When two applicants in this auction share an officer, or director, or an individual with specified ownership interests,¹³ it is at this point in each application that the

¹² 47 C.F.R. § 1.21001(b)(3).

¹³ We remind applicants that, for purposes of the communication prohibitions of 47 C.F.R. § 1.21002, section 1.21002(a) defines “applicant” as including any applicant, each party capable of controlling the applicant, and each party that may be controlled by the applicant or by a party capable of controlling the applicant.

two applicants can indicate that there is a sharing of this one individual (officer, director, or owner) by responding to this “agreement” question with a “Yes.”¹⁴

If an applicant answers “No,” the applicant will continue to the *Ownership* series of screens, described below. If the applicant answers “Yes,” the applicant will continue with additional *Agreements* screens.

In the additional *Agreements* screens, applicants must provide an identifying name for the agreement and must identify all real parties in interest to any agreements relating to the participation of the applicant in competitive bidding. The agreement identifier can be a brief description of the agreement or a simple reference name; however, each agreement identifier must be unique. Neither the name of the agreement nor its description should indicate potentially eligible area designations such as census blocks or study area codes for this auction.

Applicants may provide FRNs for the other parties to the agreement, if available. While providing the FRN is optional, it helps prevent identification errors resulting from parties having similar names or a single party using multiple names.

Up to three parties to the agreement (not including the applicant) can be identified on a single screen. Additional parties can be added by clicking the **ADD MORE PARTIES** button. In the event of an error, the name of a party and its associated FRN can be deleted from the form by clicking on the **RESET** button. After identifying all parties to a particular agreement, click the **FINISH THIS AGREEMENT** button.

The next screen, the *View/Edit Agreements* screen, lists the agreements and parties to each agreement that already have been entered. From this screen, the following options are available:

- Clicking the **Edit** icon or the **Agreements** link to return to the initial *Agreements* screen regarding whether or not the applicant has any agreements.
- Modifying agreement identifiers by clicking on them.
- Clicking the **Delete This Agreement** link to delete an agreement and associated parties.
- Modifying information regarding a particular party to an agreement by clicking on the party’s name.
- Clicking the **Remove** icon next to information about a particular party to remove that corresponding party.

¹⁴ As explained in the *Auction 901 Procedures Public Notice*, a failure to report an agreement in both short-form applications when a specified individual is involved with two applicants in the same auction can result in a violation of section 1.21002. *Auction 901 Procedures Public Notice* at paras. 51-52. Where an individual served as an officer for two or more applicants, the Bureaus have found that the bids and bidding strategies of one applicant are necessarily conveyed to the other applicant, and, absent a disclosed bidding agreement, an apparent violation of the rule prohibiting certain communications occurs. *See, e.g.*, Letter to Colby M. May, TCCSA, Inc., d/b/a Trinity Broadcasting Network, from Barbara A. Kreisman, Chief, Video Division, Media Bureau, and Margaret W. Wiener, Chief, Auctions and Spectrum Access Division, Wireless Telecommunications Bureau, DA 05-2445, 20 FCC Rcd 14648 (2005) (finding apparent violation of communication prohibitions of section 1.2105(c) where applicants with mutually exclusive applications reported sharing same individual as an officer and director and reported having no bidding agreement).

- Clicking the **Add Party to This Agreement** link to add a new party to an agreement.
- Clicking the **CREATE NEW AGREEMENT** button to add additional agreements.

When all agreements and the parties to each agreement have been identified, the applicant should click the **CONTINUE** button.

4. Ownership

The *Ownership* screens are the fourth series of screens in the FCC Form 180. In the *Ownership* screens, applicants will provide information regarding parties with ownership interests in the applicant that must be disclosed pursuant to Commission rules.¹⁵ Commission rules also require the disclosure and description of FCC-regulated businesses that are owned by the applicant and by parties with certain ownership interests in the applicant.¹⁶

a. Information Already on File with the Commission

Some applicants may have previously filed FCC Form 602 disclosing ownership information in connection with wireless services. In addition, some applicants may have filed a short-form application (FCC Form 175) for a previous auction disclosing ownership information. To simplify filling out FCC Form 180, an applicant's most current ownership information on file with the Commission will automatically be entered into the applicant's short-form application, if it is in an electronic format compatible with the short-form application (FCC Form 180) (such as information submitted in an on-line FCC Form 602 or in an FCC Form 175 filed for a previous auction using the FCC Auction System). Applicants with ownership information automatically entered into FCC Form 180 will proceed directly to the *View/Edit Ownership* screen described below.

Each applicant is responsible for ensuring that information submitted in its FCC Form 180 is complete and accurate. An applicant must carefully review any information automatically entered to confirm that it is complete and accurate as of the deadline for submitting its short-form application in this auction. Information must be corrected directly in the FCC Form 180. After the deadline for filing this FCC Form 180, submitted ownership information will be considered to be the applicant's most current information on file with the Commission for this auction.

b. Disclosable Interest Holders and FCC-Regulated Businesses

Section 1.2112(a) of the Commission's rules list the interest holders in the applicant that must be disclosed in FCC Form 180.¹⁷ **Applicants must report holders of both direct and indirect interests.**

Section 1.2112(a)(7) lists the FCC-regulated business entities, or applicants for an FCC license, that must be disclosed in FCC Form 180.¹⁸

¹⁵ 47 C.F.R. §§ 1.2112(a), 54.1005(a)(1).

¹⁶ 47 C.F.R. §§ 1.2112(a), 54.1005(a)(1).

¹⁷ Section 54.1005 requires the disclosure on the short-form application of applicant ownership information as set forth in section 1.2112(a). 47 C.F.R. §§ 1.2112(a), 54.1005.

¹⁸ 47 C.F.R. § 1.2112(a)(7).

The initial *Ownership* screen enables the applicant to add information regarding either a disclosable interest holder or the FCC-regulated businesses in which either the applicant has an interest or parties with 10% or more ownership interest in the applicant have an interest. Each screen will specify the information that the applicant must provide. Please note the following with respect to particular information requested:

- **If an application includes one or more disclosable interest holders with indirect ownership in the applicant,¹⁹ the application must include an attachment describing the relationship between the indirect interest holder(s) and the applicant.** The attachment should provide an overview of the ownership chain that links the indirect owner(s) to the applicant, e.g., indirect owner X owns 50% of holding company Y; indirect owner Z owns 50% of holding company Y; and holding company Y owns 100% of the applicant.²⁰ One attachment connecting all indirect owners to the applicant is sufficient. Applicants should not provide separate attachments for each indirect owner. An overview of the ownership connections is sufficient. The attachment should not duplicate all the detailed information already provided in the data fields of the FCC Form 180.
- The “Percent of Interest Held in Applicant” should reflect the disclosable interest holder’s aggregate ownership interest in the applicant (both direct and indirect). In some cases, e.g., circumstances where there is joint ownership or indirect ownership resulting in different owners sharing the same ownership interests, the sum of all the percentages held by disclosable interest holders may exceed 100%. In other cases, a disclosable interest holder may have a 0% ownership interest in the applicant.
- FCC-regulated businesses in which the applicant has a direct interest can be entered from the initial *Add Ownership Disclosure Information* screen. FCC-regulated businesses in which a disclosable interest holder has a direct interest can be entered from the *Add FCC Regulated Business* screen in the series of screens for entering information about a disclosable interest holder.
- When adding an FCC-regulated business, “Percent of Interest Held” refers to the percent of interest held directly by the applicant or disclosable interest holder, as applicable, in the FCC-regulated business. FCC-regulated businesses in which the applicant or disclosable interest holder has an indirect interest need not be reported in the FCC Form 180.
- To simplify filling out the FCC Form 180, applicants can click on the **Select Business(es) Already Submitted** link when entering an FCC-regulated business previously entered as an FCC-regulated business for the applicant or another disclosable interest holder. When doing so, be certain to enter the “Percent of Interest Held” in the FCC-regulated business by the current party, either the applicant or the disclosable interest holder, with respect to which the FCC-regulated business is being entered.

¹⁹ 47 C.F.R. § 1.2112(a)(6).

²⁰ *Id.*

c. View/Edit Ownership Disclosure Information

The *View/Edit Ownership Disclosure Information* screen summarizes ownership information already entered in the FCC Form 180, either automatically from compatible ownership information on file with the Commission or directly by the applicant, and provides links enabling existing information to be revised and additional information to be added.

Existing ownership information is divided into two groups:

- Disclosable Interest Holders of this Applicant
- FCC-Regulated Businesses of this Applicant

To view the detailed information submitted regarding the applicant, a disclosable interest holder or FCC-regulated business, click on the relevant party's name. To delete existing information or add a new entry in one of the categories, click on the relevant link. This screen also provides a link enabling applicants to add an FCC-regulated business directly to an existing disclosable interest holder, without needing to reenter the disclosable interest holder's information.

5. Summary

The *Summary* screens summarize information applicants have provided in previous screens, offering an overview of an applicant's FCC Form 180 to help locate specific information. These screens will appear prior to the *Certify and Submit* screens, in order to permit the applicant to review all the information entered in previous screens and to provide an opportunity to check for certain inconsistencies or omissions in the information within the FCC Form 180.

The first *Summary* screen, the *Summary Overview* screen, lists the first four series of screens in the application and provides a **VIEW/EDIT** button to access each one.

- Clicking **VIEW/EDIT** for Applicant Information produces a *Detail for Applicant Information* screen showing the information entered for each data entry field. To change any data item, the applicant should click the **Edit** icon for the relevant data field.
- Clicking **VIEW/EDIT** for Potentially Eligible Areas takes the applicant to the *View/Edit Potentially Eligible Areas Census Tracts/Blocks Summary* screen.
- Clicking **VIEW/EDIT** for Agreements takes the applicant to the *Agreements* screen discussed above in the Agreements section.
- Clicking **VIEW/EDIT** for Ownership takes the applicant to the *View/Edit Ownership Disclosure Information* screen discussed above in the Ownership section.

Clicking on the **CHECK ERRORS** button initiates an automated check of the application. If the automated check encounters certain inconsistencies or omissions in information within the FCC Form 180 that must be corrected before submitting the application, the inconsistency or omission will be listed in an Error box at the top of the screen. To correct one of these errors, click its corresponding **EDIT** button. In addition, if the automated check encounters certain apparent inconsistencies or omissions that might render the application incomplete or deficient if the application is submitted with current information, the apparent error will be listed in a Warning box. To revise the information related to the apparent inconsistency or omission, click its corresponding **EDIT** button.

Each applicant is solely responsible for providing complete and accurate information in its FCC Form 180. The automated check is provided to assist applicants in completing the FCC Form 180. However, the automated check cannot be relied upon to determine whether the information provided is complete or accurate. The automated check may not catch all errors and applicants cannot rely on the automated check to determine the completeness or the accuracy of submitted information.

If the automated check does not encounter certain inconsistencies or omissions, a box will appear displaying the message “**No Errors found - You may continue to Certify and Submit.**” Applicants may then click the **CONTINUE TO CERTIFY** button.

NOTE: An error message “You must upload a 'Spectrum Access' attachment that provides all required information relating to spectrum access” will display if the applicant has not attached the required documentation. See “Attaching Additional Information,” below, for instructions about how to provide an attachment.

6. Attaching Additional Information

If an applicant needs to provide additional information not requested directly in the screens comprising the FCC Form 180, that information can be provided in an attachment. For example, an applicant can provide information regarding its ETC designation, or tribal information.

For Auction 901, an applicant is required to provide an attachment to FCC Form 180 disclosing all required information relating to spectrum access in regards to its plans for meeting Mobility Fund obligations in the particular area(s) for which it plans to bid. The attachment type must be designated as “Spectrum Access.” Applicants should refer to Section II.E.2 of the *Auction 901 Procedures Public Notice* for further details about the information to be included in this required attachment.

The screen for adding an attachment to FCC Form 180 can be accessed by clicking on the **Attachments** link in the upper right of any screen. This screen requests information regarding the type of attachment to be added, the name of the file to be attached, and a brief description of the attachment.

NOTE: If the attachment is a request for a waiver or exemption of any of the Commission’s rules or procedures, the applicant must identify the “Type” of attachment as a “Waiver” to facilitate prompt processing.

Once the requested information is provided, applicants can add the attachment to the application by clicking on the **ADD ATTACHMENT** button. A list of any attachments already uploaded along with the applicant’s FCC Form 180 will appear at the bottom of the screen.

When uploading attachments, applicants may use a variety of file formats, including MS Word, WordPerfect 5.x or later, Adobe PDF, and ASCII text. Applicants must, however, verify that the files contain all attachment information, and files may be no larger than 10 Mb and must not be password-protected. Graphics files (e.g., .bmp, .tiff, .jpg) and spreadsheets (e.g., Excel, Lotus) are supported but not recommended.

7. Certify and Submit

The *Certify and Submit* screen is the fifth and final screen in FCC Form 180. In this screen, applicants provide certifications required of all participants in the Mobility Fund Phase I auction.²¹

The *Certify and Submit* screen lists the certifications required of all applicants in the Commission's Mobility Fund Phase I auction and requests that the applicant's certifying official be identified and sign the application.

Who Can Certify. If the applicant is a partnership, the short form application can be certified by one of the partners. If the applicant is a corporation, the short form application can be certified by an officer, director, or duly-authorized employee.

Applicants are reminded that submission of an FCC Form 180 constitutes a representation by the certifying official that he or she is an authorized representative of the applicant and has read the form's instructions and certifications, and that the contents of the application, its certifications and any attachments are true, complete and correct. Submission of a false certification to the Commission may result in penalties, including monetary forfeitures, license forfeitures, ineligibility to participate in future auctions, and/or criminal prosecution. As noted above, a change of certifying official is considered a major change of the short-form application and will not be permitted after the application deadline. Additional details about the certifications can be found in the *Auction 901 Procedures Public Notice*.

Once the *Certify and Submit* screen have been filled out, the application may be submitted by clicking on the **SUBMIT** button.

After the application has been submitted, a confirmation screen will be displayed that states the submission time and date, along with a unique file number. Applicants should print a copy of the confirmation page for their records. They may then view and print copies of their submitted applications by clicking on the **PRINT PREVIEW** button.

FCC Form 180 applications for Auction 901 must be submitted and confirmed prior to 6:00 p.m. EST on Wednesday, July 11, 2012. Late applications or unconfirmed submissions of electronic data will not be accepted.

D. Withdrawing a Short-Form Application Before the Filing Deadline and Updating Existing Short-Form Applications

1. Withdrawing an Application

To withdraw a submitted application before the short-form application filing deadline, applicants should click on the **Withdraw Application** icon on the Auction Application Manager *Create or Review Auction Applications* page. All previously-submitted data will be deleted.

After the short-form application filing deadline, an application may not be withdrawn.

²¹ See 47.C.F.R. § 54.1005.

2. Updating Existing Applications

The *Create or Review Auction Applications* page displays any application created or submitted within a filing window. This page shows the application status, the date and time the application was last updated, and the date and time the application was last submitted. It may be used as a reference to confirm the date and time of the most recent submission of the application.

To review or continue working on an existing short-form application, an applicant should click the application auction number, which will produce the application's *Summary* page in a view/edit mode. After making any updates or changes, applicants must go to the *Certify and Submit* screens and click the **SUBMIT** button to submit any changes made to their FCC Form 180 applications. After the revised application has been submitted, a confirmation page will display the application's file number and submission time and date. You should print a copy of the confirmation page for your records. Applicants may then view and print copies of their submitted applications by clicking on the **PRINT PREVIEW** button.

After the filing deadline, an applicant may make only minor changes to its application. Major modifications will not be permitted (e.g. change in ownership of the applicant that would constitute an assignment or transfer of control, or the identity of the applicant, or the certifications required in the application).²²

II. Miscellaneous

A. Access to View Short-Form Applications

After the deadline for filing short-form applications, the Commission will process all timely-submitted applications to determine which are complete. The Commission will subsequently issue a public notice identifying: (1) those that are complete; (2) those that are rejected; and (3) those that are incomplete or deficient because of minor defects that may be corrected. Once that public notice is released, any interested parties may be able to view the short-form applications by searching the FCC Auction System.

To start a search, go to either <http://auctions.fcc.gov/> (primary location) or <http://auctions2.fcc.gov> (secondary location) and click the **Auction Application Search** link in the Public Access area on the *FCC Auction System* page.

B. Technical Support

For technical assistance with using FCC software, contact the FCC Technical Support Hotline at (877) 480-3201, option nine; (202) 414-1250; or (202) 414-1255 (TTY). The FCC Technical Support Hotline is available Monday through Friday from 8 a.m. to 6 p.m. EST. All calls to the FCC Technical Support Hotline are recorded.

Paperwork Reduction Act Approval: The FCC Form 180 was assigned control number 3060-1166 and was approved, as revised, by the Office of Management and Budget on April 16, 2012.

²² 47 C.F.R. § 54.1005(b)(3)(iv).